FEDERAL COMMUNICATIONS COMMISSION Washington, D.C.		
In the Matter of CellCo Partnership d/b/a Verizon Wireless and SpectrumCo LLC)	
For Consent to Assign Licenses)	
5)	WT Docket No. 12-4
Application of Cellco Partnership d/b/a)	
Verizon Wireless and Cox TMI Wireless, LLL)	
For Consent to Assign Licenses)	

REPLY COMMENTS OF MASSACHUSETTS COMMUNITY LEADERS

Antonio Almaya **Executive Director** LaComunidad

Before the

Marya Axner Regional Director New England Jewish Labor Committee

Steven Backman, President **Database Designs**

Daryl Bridges

Director

Massachusetts Interfaith Worker Justice

Rev. Terry Burke, Minister,

First Church in Jamaica Plain, Unitarian Universalist

Russ Davis

Executive Director

Massachusetts Jobs With Justice

Ada Fuentes

Board Chair

Student Immigrant Movement

Emily Hardt

Executive Director

Women's Institute for Leadership Development

Urszula Masny-Latos Executive Director National Lawyers Guild-Massachusetts Chapter

Wilnelia Rivera Political and Policy Development Director Neighbor to Neighbor MA

Horace Small Executive Director Union of Minority Neighborhoods

Aaron Tanaka Executive Director Boston Workers' Alliance

Naomi Ramos-Winthrop Executive Director New England United Justice

Charlie Welch Administrator TecChange

Dated: March 23, 2012

We, community leaders in the city of Boston, are deeply concerned that the proposed partnership between Verizon Wireless and the cable companies such as Comcast will leave our state, and the city of Boston, in particular on the wrong side of the digital divide. Boston is a world class city, whose major industries include technology and research. Our local universities and hospitals, some of the finest in the world, need high speed internet access to do the cutting edge research to maintain their standing. Our hospitality industry needs to provide high speed internet access to its many guests from around the world.

Despite what we consider a strong business case, Verizon has only built its fiber optic network in one small section of one neighborhood in the city of Boston. This has left the rest of the city with a choice of cable or no high speed internet access. We have been told that Verizon wants to be part of our neighborhoods, but has yet to act on those words. As a result of the proposed Verizon/cable company partnership, we are deeply concerned that Verizon will never build its FiOS network in Boston to compete with its new cable partner Comcast. Such a decision will deprive our citizens, small businesses, schools, and hospitals of the benefits of the all-fiber FiOS network and video competition that is available in most of the wealthy surrounding suburbs, including neighboring towns like Belmont and Wellesley.

The decision to bypass Boston disproportionately impacts minority and lower-income residents, small businesses, seniors and neighborhoods. It also hurts the city's ability to attract jobs. In order to protect the public interest, we join together to urge the FCC to condition any approval of the Verizon/cable Transaction on specific guarantees that Verizon will expand its FiOS network to currently un-served areas within its traditional telephone network footprint, including development throughout the city of Boston and the surrounding areas that do not have access to FiOS.

High-speed broadband is a critical factor in fueling economic growth, job creation, and improvements in education, health care, energy conservation, public safety, and other essential services. As community leaders

in Massachusetts, we know that affordable, high-speed internet access is critical to economic development, the quality of life, and opportunity for the residents and small businesses in our city. We also know that advanced telecommunications networks introduce video competition, with the potential to benefit consumers with lower prices and new and improved video services.

As community leaders in Massachusetts, we have watched as Verizon Communications has built its all-fiber FiOS network in the wealthy suburban communities that ring our city. To date, Lynn is the only middle income city within which they have built FiOS. All others have been wealthy suburban communities. In those communities, we have seen what happens when Comcast, our local cable monopoly, competes head-on with Verizon's FiOS to provide video and broadband services. Consumers benefit from competitive choice; small businesses benefit from truly high-speed connections to suppliers and customers; schools and hospitals benefit from education and health-related applications; communications workers benefit from the jobs building, maintaining, and servicing networks; and families and communities benefit from the 21st century jobs and expanded tax base.

But to date, the residents and small businesses in Boston have not been able to reap these benefits. That is because Verizon has chosen not to deploy its all-fiber FiOS network to the densely-populated city of Boston and other urban communities. The proposed Verizon Wireless/cable company partnership would cement this digital divide, and foreclose the possibility of effective high-speed broadband and video competition in our city. Verizon Wireless is a subsidiary of Verizon Communications. We are deeply concerned that as a result of the new joint marketing agreement, Verizon will have a disincentive to invest in an all-fiber network that competes with Verizon Wireless' new partner, Comcast.

Therefore, to promote high-speed broadband investment and video competition, especially in heavily minority and lower-income areas like the city of Boston, the FCC should include as a condition for approval of this Transaction a requirement that Verizon continue to invest in and build-out its FiOS network to currently unserved areas that are inside its traditional telephone service area footprint, including the city of Boston and other urban communities in our state.

Over the past year, community organizations, elected officials, and unions joined together to urge Verizon to build FiOS in the city of Boston. Many of us joined the "Don't Bypass Boston" coalition in response to Verizon's failure to build FiOS in Boston. We repeatedly impressed on Verizon the facts to demonstrate that there is a strong business case to build FiOS in the densely-populated city of Boston.

The decision to bypass Boston disproportionately impacts minority and lower-income residents, small businesses, and neighborhoods.

We are concerned that the Verizon Wireless/cable company agreement spells the effective death knell of a fiber-optic future for Boston with our significant minority and lower-income population. We do not believe that Verizon would endanger its partnership with the cable companies, which will be very lucrative, by expanding the FiOS network, a direct cable competitor. The same reasoning applies to Verizon's willingness to aggressively market FiOS against Comcast Cable or other cable companies. Previously competitive rivals will become partners – and consumers will suffer. This is contrary to the purpose of Federal regulation and law.

The lack of a fiber optic network has serious consequences for Boston's future, including:

- No cable competition. Comcast Cable is the monopoly cable provider in the city of Boston. If Verizon does not build FiOS, Comcast will maintain its monopoly in Boston.
- No jobs from building FiOS. Building, installing and maintaining the FiOS network in Boston requires hundreds of workers.

- No jobs from economic development sparked by a high-speed network broadband access leads to economic development.
- Higher prices. As FCC studies demonstrate, even one wireline competitor leads to lower prices.
- Inferior service quality. Monopoly providers can neglect service quality because they do not face competitive pressure.

High speed internet service is necessity not a luxury. The FCC should condition any approval of this Transaction on conditions that guarantee FiOS network development, including development throughout the city of Boston and the surrounding areas that do not have access to FiOS.

Respectfully submitted,

Antonio Almaya

Executive Director

LaComunidad: La Comunidad Inc. is a non-profit organization funded to provide a better future to the Latino American Community in the city of Everett and surrounded areas. More information can be found at www.lacomunidadinc.org.

Marya Axner

Regional Director

New England Jewish Labor Committee: The New England Jewish Labor Committee is a part of the Jewish Labor Committee, an independent secular 501(c)3 organization, is the voice of the Jewish community in the labor movement and the voice of the labor movement in the Jewish community. For more information visit http://www.jewishlaborcommittee.org/

Steven Backman,

President

Database Designs: Database Designs is an independent technology consulting firm with 20 years experience serving non-profits, government and business. With deep roots in the Boston metro area, but with clients nationwide, we are proud of the longstanding relationships we have built with a broad range of organizations including community and advocacy groups, universities and independent schools, labor organizations, and medical programs. More information can be found at http://dbdes.com/

Daryl Bridges

Director

Massachusetts Interfaith Worker Justice: The Massachusetts Interfaith Committee for Worker Justice is a non-profit, educational organization formed to educate the public about the needs of all working people, but especially those marginalized in the workforce, including immigrants and the working poor. We also assist in local initiatives to assist the immigrant community and others economically disadvantaged. Especially prominent among these projects is our support for the Ana da Hora Workers Center in East Boston, founded in January 2000. For more information visit http://massinterfaith.wordpress.com/

Rev. Terry Burke, Minister,

First Church in Jamaica Plain, Unitarian Universalist. First Church is one of the centers of Jamaica Plain life, offering spiritual and communal support to its parish members and the wider community.

Russ Davis

Executive Director

Massachusetts Jobs With Justice: Massachusetts Jobs with Justice is a coalition of over 110 Community, Religious, and Labor organizations dedicated to protecting and promoting workers rights. More information can be found at www.massjwj.net

Ada Fuentes

Board Chair

Student Immigrant Movement: The Student Immigrant Movement is a statewide immigrant youth-led organization based in Massachusetts. We identify, recruit and develop leaders in local cities and towns who are invested in improving their communities through relational building, leadership development, electoral organizing and using both strategic and motivational campaigns that build movement. More information can be found at www.simforus.com.

Emily Hardt

Executive Director

Women's Institute for Leadership Development: WILD provide education, training and support to help women become ever more effective organizers and leaders: in their unions and the labor movement as a whole; in the political arena and within their communities. More information can be found at http://www.wildlabor.org/.

Urszula Masny-Latos

Executive Director

National Lawyers Guild-Massachusetts Chapter: NLG MA brings together lawyers, law students, paralegals, judges, legal secretaries, and community activists to collaborate in the process of using the law for social, political, and economic justice. More information can be found at http://www.nlgmass.org/.

Wilnelia Rivera

Political and Policy Development Director

Neighbor to Neighbor MA:. Neighbor to Neighbor Massachusetts is a progressive organization of working class, multi-racial, and multi-ethnic people working together to build political and economic power to improve the quality of lives in our communities. As members, we lead the change ourselves through education & training, issue & electoral organizing, policy advocacy, alliance building, community-controlled economic development, and holding decision-makers accountable. More information at www.n2nma.org.

Horace Small

Executive Director

Union of Minority Neighborhoods: The mission of the Union of Minority Neighborhoods is to confront threats to civil liberties and human rights by working to ensure skilled, committed, grassroots leaders of color can effectively organize on issues of concern in their communities. More information at www.unionofminorityneighborhoods.org.

Aaron Tanaka

Executive Director

Boston Workers' Alliance: Boston Workers Alliance (BWA) is a community organization led by unemployed and underemployed workers fighting for employment rights. We have united to end CORI (Criminal Offender Record Information) discrimination and the crisis of joblessness in the community. We fight for social and economic justice by creating and demanding decent jobs for all people who want to work. More information at www.bostonworkersalliance.org.

Naomi Ramos-Winthrop

Executive Director

New England United Justice: New England United 4 Justice is a non-profit membership-based organization that represents low and moderate income families who want to promote social justice and become more

involved in improving their neighborhood, city and state. We are a multi-issue organization that focuses on issues that are elected by our members who carry the voice and determine the direction of the organization. The organization also seeks to educate the general public about social justice issues and about the needs of the poor and middle class families in our communities. More information can be found at www.neunited4justice.org.

Charlie Welch Administrator

TecChange: TecChange is a volunteer run organization that provides technology and tech skills to groups working for social change locally, regionally, and globally. More information available at www.tecschange.org.